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RIGHT MANAGEMENT CONSULTANTS, INC.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

MARY JEAN HONG,
Plaintiff,

v.

RIGHT MANAGEMENT
CONSULTANTS, INC., DOES 1 through
100, inclusive,

Defendants.

CASE NO. C-04-4011 PJH

**THIRD JOINT STIPULATION AND
[PROPOSED] ORDER REGARDING
EXTENSION OF TIME TO COMPLETE
ENE SESSION AND CONTINUANCE OF
FURTHER CASE MANAGEMENT
CONFERENCE**

Judge: Hon. Phyllis J. Hamilton
Evaluator Deborah S. Shefler

Further CMC: September 1, 2005
Trial: May 29, 2006

1 **WHEREAS**, Plaintiff Mary Jean Hong ("Plaintiff") and Defendant Right Management
2 Consultants, Inc. ("Defendant") ("jointly referred to herein as the "Parties") agree that extending the
3 deadline for completing Early Neutral Evaluation ("ENE") to October 28, 2005 will afford the
4 Parties sufficient time to complete the necessary discovery and prepare for a meaningful and
5 productive ENE session;

6 **WHEREAS**, the Parties have discussed said extension with Evaluator Deborah Shefler, who
7 agrees to retain this case;

8 **WHEREAS**, both Parties have propounded written discovery in the form of special
9 interrogatories and document requests and are currently meeting to informally resolve the disputed
10 items relative to Plaintiff's requests;

11 **WHEREAS**, although some depositions have been taken, further depositions are necessary,
12 including two hours of Plaintiff's deposition, the deposition of Defendant's Person Most
13 Knowledgeable, the deposition of Nancy Czajkowski, the deposition of Gail Weibley and, Plaintiff
14 contends, further deposition of Jay Klein;

15 **WHEREAS**, the aforementioned extension request will not affect the May 29, 2006 trial
16 date or related pre-trial dates set by this Court, and it appears that good cause exists for the entry of
17 an Order extending the ENE deadline to October 28, 2005;

18 **WHEREAS**, the Parties also agree that the Further Case Management Conference currently
19 set for September 1, 2005 before this Court be continued to November ___, 2005, following the
20 Parties' completion of the ENE process;

21 **IT IS HEREBY STIPULATED AND AGREED** by and between the Parties hereto,
22 through their undersigned counsel, as follows: the ENE session for the above-captioned matter
23 currently set for August 31, 2005 shall be continued to October 28, 2005 before Evaluator Deborah
24 Shefler.

25 **IT IS HEREBY STIPULATED AND AGREED** by and between the Parties hereto,
26 through their undersigned counsel, that the ENE briefs will be exchanged between the Parties and
27 submitted to Evaluator Shefler no later than 7 days before said ENE session.

1 **IT IS HEREBY STIPULATED AND AGREED** by and between the Parties hereto,
2 through their undersigned counsel, that the Parties respectfully request that the Further Case
3 Management Conference in this action, which is currently set for September 1, 2005, be continued to
4 November 3, 2005 or as soon thereafter as this matter may proceed before the Court.

5 **IT IS SO STIPULATED.**

6 DATED: August 16, 2005

THE LOUDERBACK LAW FIRM

8 By: s/Charles M. Louderback

CHARLES M. LOUDERBACK

JANINE R. HUDSON

Attorneys for Plaintiff

MARY JEAN HONG

12 DATED: August 16, 2005

LITTLER MENDELSON, P.C.

14 By: s/Nancy E. Pritikin

NANCY E. PRITIKIN

GABRIEL S. LEVINE

Attorneys for Defendant

RIGHT MANAGEMENT

CONSULTANTS, INC.

18 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

19
20 DATED: 8/19/05

By: 
HON. PHYLLIS J. HAMILTON
United States District Court Judge

23 NO FURTHER
24 EXTENSIONS